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January 29, 2025

**BY ECF**

The Honorable Ronnie Abrams  
United States District Court, Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, New York 10077

Re: Gotlib v. FDIC as Receiver for Signature Bank, et al. (Case No. 24-cv-08197)

Dear Judge Abrams:

We write on behalf of the Federal Deposit Insurance Corporation (“FDIC”) as Receiver for Signature Bank and FDIC as Receiver for Signature Bridge Bank, N.A. (together, the “FDIC-Rs”) pursuant to Your Honor’s Individual Rule 1(D) and FRCP 26(c), to respectfully request a stay of discovery (including the initial pretrial conference scheduled for February 7, 2025 and related pre-conference deadlines), pending the Court’s decision on the FDIC-Rs’ motion to dismiss, which was filed on Monday (ECF 13-15) (the “Motion to Dismiss”). Counsel for plaintiff Joshua Gotlib (“Plaintiff”) has advised that while Plaintiff contests the Motion to Dismiss, Plaintiff does not object to a stay of discovery during the pendency of the motion.

The FDIC-Rs believe that a stay of discovery is appropriate here given the time and expense of discovery and because the FDIC-Rs have limited receivership funds potentially available to distribute to creditors pursuant to 12 U.S.C. § 1821(d)(11)(A).

Previously the Court adjourned the initial pretrial conference until February 7, 2025 on the parties’ joint request. (ECF 12). However, this is the first request for a full stay of discovery pending resolution of the Motion to Dismiss.

We thank the Court in advance for its attention to this matter.

Respectfully submitted,

/s/ Casey D. Laffey

cc: All counsel of record (by ECF)

Application granted. Given that the parties consent to a stay of discovery, discovery in this action is hereby stayed pending further order of the Court. Additionally, the initial conference previously scheduled for February 7, 2025 is adjourned *sine die*.

SO ORDERED.



Hon. Ronnie Abrams

January 30, 2025